Attachment A, Statement of Work

Compliance review support pursuant to Section 504 of the Rehabilitation Act of 1973, as amended

1.0 Purpose

The NASA Office of Diversity and Equal Opportunity (ODEO) requires professional services for extensive support in preparing and conducting compliance reviews pursuant to Section 504 of the Rehabilitation Act of 1973 (Section 504), as amended. The contractor shall assist and support NASA in conducting Section 504 compliance reviews on institutions receiving NASA financial assistance in the following areas:

- Making overall Section 504 compliance assessments that would meet NASA's standard for legal sufficiency.
- Examining policies, procedures and practices developed and implemented to guide the participation of individuals with disabilities.
- Inspection of buildings and facilities, grounds, sites, equipment to individuals with orthopedic, visual, hearing, cognitive and other disabilities.

The contractor will prepare and conduct on-site compliance reviews pursuant to Section 504 in the highly technical and professional settings, such as the university sciences and engineering departments; research laboratories; planetariums and museums; or in similar contexts. At a minimum, NASA will conduct one (1) Section 504 on-site compliance review biannually.

2.0 Background

The ODEO has the primary Agency responsibility for evaluating compliance of its grant recipients (recipients) with the NASA Section 504 implementing regulations. These recipients receive NASA financial assistance in the form of grants, cooperative agreements, and Space Act Agreements. In this capacity, ODEO undertakes periodic onsite compliance reviews of its recipients. ODEO will send one to two professional staff members to each recipient institution to lead the on-site reviews. However, due to limited human resources and limited expertise in critical Section 504 areas, ODEO has need for contractor assistance in the review process. ODEO will be responsible for providing the contractor with:

- Background materials such as the NASA Section 504 regulations and necessary documentation and other media from recipients selected for onsite compliance activities; and
- Setting the regulatory and operational scope of Section 504 compliance activities that outline the subject matter areas, programs, facilities, equipment and aids that will be reviewed at each recipient institution.

3.0 Scope

The scope of the work to be performed may include:

3.1 Onsite Compliance Reviews

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3.1.1 Pre-onsite Preparation Requirements

The vendor shall review and analyze information, statistical data, and other materials provided by the subject institution in response to NASA's information request(s), prior to the on-site review, including policies, procedures, and practices to identify (1) potential regulatory deficiencies and concerns regarding compliance with Section 504, such as evidence of non-compliance with procedural requirements, e.g., internal complaints procedures, or issues regarding architectural or program accessibility; (2) best or promising practices relating to Section 504 compliance that exhibit new or innovative strategies that can serve as a model for other NASA grantees; and (3) any additional data that might need to be reviewed and/or clarified on-site (e.g., accessibility surveys, complaints information). Review and analyze specific compliance information particularly regarding information that triggers potential compliance concerns. The following deliverables will be required:

Deliverable: A written summary of compliance issues, best practices, and additional information needed, identified from review and analysis of the information sources described above;

Deliverable: Modified and customized existing NASA interview questions for key recipient institution individuals (e.g., institutional head, Section 504 coordinator), and program participants (e.g., museum patrons, local disability groups), utilizing specific information obtained through internet research and provided by the institution in its response to NASA's information request(s), prior to the on-site review, particularly information that triggers potential compliance concerns. **Estimated time for completion** (from date requested): 2 weeks.

3.1.2 Onsite Interview and Related Requirements

Upon request by authorized NASA personnel, the contractor shall 1) Conduct on-site interviews program beneficiaries and administrative and professional staff at grant recipient institutions during onsite reviews. The contractor will conduct follow-up onsite interviews by phone, if necessary.; 2) Conduct on-site examinations of recipient records; 3) Inspect buildings and facilities, grounds, paths of travel, signage, sites, exhibits, kiosks, equipment and media to determine whether they are accessible to individuals with disabilities, including orthopedic, visual, hearing, cognitive and any other conditions that are regarded as disabilities within the meaning of Section 504, and 3) Brief NASA on findings and concerns following the on-site visit. The contractor and NASA ODEO personnel will conduct the onsite together.

Deliverable: Written reports for all reviews and interviews that were conducted both onsite and post on-site. **Estimated time for completion (from date requested): 2 weeks**

3.1.3 Post-onsite Requirements

Analyze and synthesize data and information gathered from the information request(s), examination of records, on-site inspection of buildings, facilities, exhibits, equipment and

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media, and interviews to write a draft compliance review report. The report will include a detailed compliance assessment for all regulatory provisions addressed in the review; strategies/methods for strengthening compliance; and promising practices, either currently being undertaken by the educational institution or recommended. In addition, the contractor will brief NASA personnel on the draft compliance report and provide suggestions for negotiated agreements between NASA and the educational institution, as needed.

Deliverable: Written draft compliance review report as described above. **Estimated** time for completion (from date requested): 2 months

4.0 Travel

The contractor's services shall require travel in support of the SOW. Each on-site review will require a stay of two to four nights at the on-site location to conduct two to three days of reviews/interviews at an educational institution, museum, science center or planetarium. Travel destinations will be within the United States. Travel expenses will be reimbursed at actual cost, in accordance with the Federal Travel Regulations (FTR) and the Federal Acquisition Regulations, part 31. All travel shall be approved in advance by the government.

5.0 Other Direct Costs

The contractor shall provide minor miscellaneous costs to include mailing of reports, photocopying, and faxing.